

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: § **CASE NO. 14-32867**
Garrison Municipal Partners, LP, §
Debtor § **(Chapter 7)**

**DON GREEN AND KAY GREEN RESPONSE TO TRUSTEE'S OMNIBUS OBJECTION
TO PROOF OF CLAIM FILED BY PARTNERS OF GARRISON MUNICIPAL
PARTNERS, L.P.
[Docket No. 252]**

**TO THE HONORABLE JUDGE KAREN K. BROWN, UNITED STATES BANKRUPTCY
JUDGE:**

COMES NOW Don Green and Kay Green (referred herein as "Green" or "Claimants") and file this response to Trustee's Omnibus Objection to Proof of Claim filed by Partners of Garrison Municipal Partners, L.P. ("Garrison") ("Objection") and, in support thereof, would respectfully show the Court the following:

1. Claimants admit to the allegations contained in paragraph 1.
2. Claimants admit to the allegations contained in paragraph 2.
3. Claimants admit to the allegations contained in paragraph 3.
4. Claimants admit to the allegations contained in paragraph 4.
5. Claimants have insufficient information to admit or deny such allegations and therefore deny the allegations paragraph 5.
6. Claimants have insufficient information to admit or deny such allegations and therefore deny the allegations paragraph 6.
7. Claimants have insufficient information to admit or deny such allegations and therefore deny the allegations paragraph 7.
8. Claimants admit to the allegations contained in paragraph 8.
9. Claimants have insufficient information to admit or deny the allegations contained in paragraph 9 of the Objection and therefore deny the allegations in paragraph 9.
10. Claimants admit that they have filed a claim as a general unsecured creditor. Claimants have insufficient information to admit or deny the remaining allegations contained in paragraph

10 of the Objection and therefore deny the remaining allegations in paragraph 10.

11. Claimants deny the allegations in paragraph 11.
12. Claimants deny the allegations in paragraph 12.
13. Claimants deny the allegations in paragraph 13.
14. Claimants have insufficient information to admit or deny the allegations contained in paragraph 14 of the Objection and therefore deny the allegations in paragraph 14.
15. Claimants have insufficient information to admit or deny the allegations contained in paragraph 15 of the Objection and therefore deny the allegations in paragraph 15.
16. Claimants deny the allegations in paragraph 16 as to Claim number 2.
17. Claimants have insufficient information to admit or deny the allegations contained in paragraph 17 of the Objection and therefore deny the allegations in paragraph 17.
18. X Claimants have insufficient information to admit or deny the allegations contained in paragraph 18 of the Objection and therefore deny the allegations in paragraph 18.
19. Claimants have insufficient information to admit or deny the allegations contained in paragraph 19 of the Objection and therefore deny the allegations in paragraph 19.
20. Claimants have insufficient information to admit or deny the allegations contained in paragraph 20 of the Objection and therefore deny the allegations in paragraph 20.
21. Claimants object to the relief requested by Garrison in paragraph 21 as to claim number 2.
22. Claimants deny the allegations contained in last paragraph of the Objection.

WHEREFORE, based upon the foregoing, Claimants request the Court deny the Trustee's Omnibus Objection to Proof of Claim for Claim Number 2 filed by Claimants, and for such other relief as to which Claimants are entitled.

DATED: September 7, 2017

Respectfully submitted,

/s/ Reese W. Baker

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Attorney for Don and Kay Green

CERTIFICATE OF SERVICE

I certify that a true and correct copy of Don Green and Kay Green to Response to Trustee's Omnibus Objection to Proof of Claim filed by Partners of Garrison Municipal Partners, L.P. was served on September 7, 2017, to the parties listed below as by electronic delivery of the clerk of Bankruptcy Court:

US Trustee
USTPRegion07.HU.ECF@USDOJ.GOV

Christopher Adams on behalf of Debtor Garrison Municipal Partners, LP
cadams@oakllp.com , teaston@okinadams.com

Charles Rubio on behalf of Rodney D. Tow, Chapter 7 Trustee
crubio@diamondmccarthy.com

Rodney D Tow, Chapter 7 Trustee
rtow@rtowtrustee.com

/s/ Reese W. Baker

Reese W. Baker

VERIFICATION OF TRANSMITTAL TO U.S. TRUSTEE

The undersigned, an attorney, under penalties of perjury, verifies that a copy of the Application to Employ Attorney was delivered to the United States Trustee, 515 Rusk, Suite 3516, Houston, Texas 77002, on September 7, 2017, by electronic delivery by the clerk of the Bankruptcy Court.

/s/ Reese W. Baker

Reese W. Baker